

UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF INDIANA  
NEW ALBANY DIVISION

IN RE:

ROBERT H. WRIGHT  
KRISTINA D. WRIGHT  
DEBTORS

}  
}  
}

CASE NO. 10-93006-BHL-13

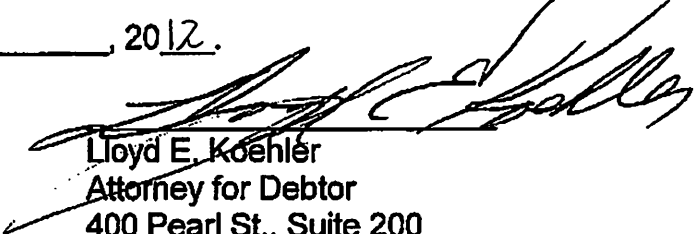
**MOTION TO MODIFY DEBTORS' CHAPTER 13 PLAN**  
**AND NOTICE OF OBJECTION DEADLINE**

Come now the above-captioned Debtors by Counsel, and files his Motion to Modify Debtors' Chapter 13 Plan. In support of this Motion, Counsel for the Debtors state as follows:

1. The Debtors propose to cure their pending plan delinquency up through and including December, 2012 by the subject amendment to the plan.

WHEREFORE, the Debtors by Counsel, requests the Court to modify their plan by increasing their payments from \$1,057.00 per month to \$1,086.36 per month commencing in January, 2013.

Dated this 30<sup>th</sup> day of Dec, 2012.



Lloyd E. Koehler

Attorney for Debtor

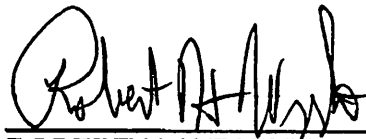
400 Pearl St., Suite 200

New Albany, Indiana 47150

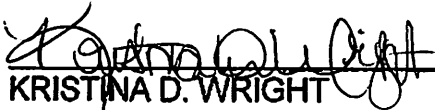
Telephone: (812)949-2211

Fax: (812)941-3907

E-mail: [lloydkoehler@hotmail.com](mailto:lloydkoehler@hotmail.com)



ROBERT H. WRIGHT



KRISTINA D. WRIGHT

**NOTICE IS GIVEN THAT** any Objection must be filed with the Bankruptcy Clerk within **21 days** from the date of service [or such other time period as may be permitted by Fed.R.Bankr.P.9006(f)]. Those not required or not permitted to file electronically must deliver any objection by U.S. mail, courier, overnight/express mail, or in person at:

U.S. Bankruptcy Court  
110 U.S. Courthouse  
121 W. Spring Street  
New Albany, Indiana 47150

The objecting party must ensure delivery of the objection to the party filing the motion, (the Trustee – if not the movant or the objector) (and the Debtor – if not the movant or the objector). **If an objection is NOT timely filed, the requested relief may be granted.**

**CERTIFICATE OF SERVICE**

The undersigned certifies that on the 3rd day of January, 2013 a copy of the foregoing was filed electronically. Notice of this filing will be sent to the following parties through the Court's Electronic Case Filing System:

Joseph M. Black, Jr., Chapter 13 Trustee: [jmbecf@trustee13.com](mailto:jmbecf@trustee13.com)  
U.S. Trustee: [ustpreion10.in.ecf@usdoj.gov](mailto:ustpreion10.in.ecf@usdoj.gov)

I further certify that a true copy of the foregoing Motion to Modify was sent via U.S. Mail this 3rd day of January, 2013 to all parties attached hereto:

  
Lloyd E. Koehler

Label Matrix for local noticing  
0756-4  
Case 10-93006-BHL-13  
Southern District of Indiana  
New Albany  
Thu Jan 3 13:15:46 EST 2013

Capital One, N.A.  
Bass & Associates, P.C.  
3936 E. Ft. Lowell Rd, Suite 200  
Tucson, AZ 85712-1083

Floyd Superior Court II  
22D02-1009-SC-898  
311 Hauss Sq. #425  
New Albany, IN 47150-3570

HARRISCTY  
425 N. CAPITAL  
PO BOX 33  
CORYDON, IN 47112-0033

Harrison Co. Credit Bureau, Inc  
PO Box 33  
425 N. Capitol Ave  
Corydon, IN 47112-1532

Koehler Law Office  
400 Pearl St Suite 200  
New Albany, IN 47150-3451

MED-1 SOL  
6239 S EAST ST STE F  
22D02-1009-SC-898  
INDIANAPOLIS, IN 46227-2088

NAVY FCU  
1 SECURITY PLACE  
MERRIFIELD, VA 22116

Navy Federal Credit Union  
PO Box 3000  
Merrifield, VA 22119-3000

Kristina Danielle Wright  
2875 Fairdale Rd  
Ramsey, IN 47166-8408

BRCLYSBANKDE  
P.O. B 8803  
WILMINGTON, DE 19899-8803

Stacy Jean DeLee  
Foutty & Foutty  
155 E Market St #605  
Indianapolis, IN 46204-3280

GEMB/SAMS  
PO BOX 981400  
EL PASO, TX 79998-1400

HSBC Bank Nevada, N.A.  
Bass & Associates, P.C.  
3936 E. Ft. Lowell Road, Suite #200  
Tucson, AZ 85712-1083

Indiana Department of Revenue  
Bankruptcy Division  
100 N. Senate Ave. #N-240  
Indianapolis, IN 46204-2231

Lloyd E Koehler5  
400 Pearl Street Ste 200  
New Albany, IN 47150-3451

MIDLAND MTG  
POB 268959  
OKLAHOMA CITY, OK 73126-8959

NAVY FCU  
820 FOLLIN LANE  
VIENNA, VA 22180-4907

THD/CBSD  
PO BOX 6497  
SIOUX FALLS, SD 57117-6497

Robert Hollis Wright  
2875 Fairdale Rd  
Ramsey, IN 47166-8408

Joseph M. Black Jr  
PO Box 846  
Seymour, IN 47274-0846

Teresa E. Dearing  
Foutty & Foutty, LLP  
155 E Market St Ste 605  
Indianapolis, IN 46204-3280

Gerald McIntire  
6239 S. East Street Ste F  
22D02-1009-SC-898  
Indianapolis, IN 46227-2088

HSBC/Kawasaki  
P.O. Box 15521  
Wilmington, DE 19850-5521

(p)INTERNAL REVENUE SERVICE  
CENTRALIZED INSOLVENCY OPERATIONS  
PO BOX 7346  
PHILADELPHIA PA 19101-7346

MED-1 SOL  
6239 S EAST ST  
SUITE F  
INDIANAPOLIS, IN 46227-2088

MidFirst Bank  
c/o Midland Mortgage Co.  
999 N.W. Grand Boulevard  
Suite #110  
Oklahoma City, Oklahoma 73118-6116

National Capital Management, LLC.  
8245 Tournament Drive  
Suite 230  
Memphis, TN 38125-1741  
USA

U.S. Trustee  
101 W. Ohio St.. Ste. 1000  
Indianapolis, IN 46204-1982

The preferred mailing address (p) above has been substituted for the following entity/entities as so specified by said entity/entities in a Notice of Address filed pursuant to 11 U.S.C. 342(f) and Fed.R.Bank.P. 2002 (g)(4).

Internal Revenue Service - Bankruptcy  
POB 21126  
Philadelphia, PA 19114-0326

The following recipients may be/have been bypassed for notice due to an undeliverable (u) or duplicate (d) address.

(u)Basil H. Lorch III

(u)MidFirst Bank

(u)Midland Mortgage Co.

End of Label Matrix	
Mailable recipients	28
Bypassed recipients	3
Total	31